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Attorneys for Plaintiff  
United States of America

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN CARLOS MARTINEZ CASTRO, and  
SHANNON JEFFRIES,

Defendants.

CASE NO. 2:19-CR-00233-TLN

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: August 26, 2021

TIME: 9:30 a.m.

COURT: Hon. Troy L. Nunley

**STIPULATION**

1. By previous order, this matter was set for status on August 26, 2021.

2. By this stipulation, the defendants now move to continue the status conference until October 7, 2021, at 9:30 a.m., and to exclude time between August 26, 2021, and October 7, 2021, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) Counsel for the defendants desire additional time consult with their clients, review the discovery, conduct defense investigation and research, discuss potential resolution, and otherwise prepare for trial.

b) Counsel for the defendants believe that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into

account the exercise of due diligence.

c) The government does not object to the continuance.

d) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of August 26, 2021 to October 7, 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: August 17, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

/s/ JUSTIN L. LEE  
JUSTIN L. LEE  
Assistant United States Attorney

Dated: August 17, 2021

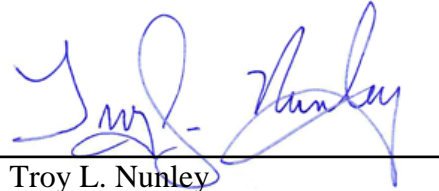
/s/ HANNAH LABAREE  
HANNAH LABAREE  
Counsel for Defendant  
JUAN CARLOS MARTINEZ CASTRO

Dated: August 17, 2021

/s/ CHRIS COSCA  
CHRIS COSCA  
Counsel for Defendant  
SHANNON JEFFRIES

**FINDINGS AND ORDER**

IT IS SO FOUND AND ORDERED this 17<sup>th</sup> day of August, 2021.



Troy L. Nunley  
United States District Judge